

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

Lisa Marie Novosat : Case No. 22-22250-CMB
Debtor(s) : Chapter 13

Truman 2021 SC9 Title Trust : Related to Document 54

Movant(s) :
vs. : Hearing: 5/2/24 at 11:00 a.m.

Lisa Marie Novosat :
Ronda J. Winnecur, Trustee :
Respondents :
:

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM THE
AUTOMATIC STAY AS TO PROPERTY LOCATED AT 48 MARION
DRIVE, ZELIENOPLE, PENNSYLVANIA 16063

Ronda J. Winnecur, Chapter 13 Standing Trustee, respectfully represents the following:

1. Truman 2021 SC9 Title Trust requests relief from the Automatic Stay as to the property located at 48 Marion Drive, Zelienople, Pennsylvania 16063.

2. The value of the Mortgaged Property according to the Debtor's schedules is \$255,000.00, and the value of the portion the Debtor owns is \$127,500.00.

3. Debtor has claimed exemptions in the collateral in the amount of \$27,900.00, under 11 U.S.C. § 522(d)(1).

4. Movant asserts a payoff amount against the property in the amount of \$121,006.37.

5. The Debtor is currently in arrears.

6. Despite Debtor's arrears, the Debtor appears to have equity in the property, which should be preserved for the benefit of the estate.

WHEREFORE, the Trustee so reports to the Court.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: April 15, 2024

By: /s/ James C. Warmbrodt
James C. Warmbrodt, PA I.D. 42524
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Respondents :

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of April 2024, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Office of the United States Trustee
1000 Liberty Avenue, Suite 1316
Pittsburgh, PA 15222

Lisa Marie Novosat
48 Marion Drive
Zelienople, PA 16063

Daniel P. Foster, Esquire
1210 Park Avenue
Meadville, PA 16335

Emmanuel J. Argentieri, Esquire
52 Newton Avenue, PO Box 456
Woodbury, NJ 08096

/s/Rosa Richard
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